

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

_____	§	
	§	Civil Action No.: 3:13-CV-00147-KC
Bradley Peterson,	§	
Plaintiff,	§	
	§	
vs.	§	
	§	
Green Tree Servicing LLC	§	
Defendant.	§	
_____	§	

**DEFENDANT'S INITIAL DISCLOSURES**

Defendant Green Tree Servicing LLC ("Green Tree") hereby serves its initial disclosures on Plaintiff Bradley Peterson and would respectfully disclose the following:

- 1. The name and if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.**

In support of its claims or defenses, Defendants may use the following individuals likely to have discoverable information:

1. Bradley Peterson  
Plaintiff  
Sergei Lemberg  
Lemberg & Associates  
1100 Summer St., 3<sup>rd</sup> Floor  
Stamford, CT 06905  
(203) 653-2250

Bradley Peterson is the named Plaintiff.

2. Any authorized representative of Green Tree Servicing LLC  
Green Tree Servicing LLC  
7360 South Kyrene Rd

**DEFENDANT'S INITIAL DISCLOSURES**

Tempe, AZ 85283  
(855) 454-2908

Any authorized representative of Green Tree would have knowledge of the information contained in Green Tree's files and of the collection efforts made on Plaintiff's account.

Defendants reserve the right to supplement this Disclosure as allowed by the Federal Rules of Civil Procedure.

2. **A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.**

In support of its claims or defenses, Defendants may use the following documents:

1. That certain Retail Installment Contract signed by Plaintiff Bradley Peterson for purchase of the Manufactured Home (the "Contract").
  2. Call logs which specifically reflect phone calls made to Plaintiff Bradley Peterson's cell phone.
3. **A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.**

At this time, Defendant has not asserted any affirmative claims for relief, but reserves the right to assert an affirmative claim in the event it becomes necessary.

4. **For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

There is no insurance coverage available for the claims asserted in this case.

**DEFENDANT'S INITIAL DISCLOSURES**

Respectfully submitted,

HIGIER ALLEN & LAUTIN, P.C.

By: /s/ Richard A. McKinney  
Richard A. McKinney  
*Attorney-in-charge*  
State Bar No. 13723430

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ATTORNEY FOR DEFENDANT GREEN TREE  
SERVICING LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on the 29<sup>th</sup> day of July, 2013, a true and correct copy of the foregoing was sent via U.S. Certified Mail, Return Receipt Requested and/or via fax to:

Sergei Lemberg  
Lemberg & Associates  
1100 Summer St., 3<sup>rd</sup> Floor  
Stamford, CT 06905  
(203) 653-3424 fax

/s/ Richard A. McKinney  
Richard A. McKinney

**DEFENDANT'S INITIAL DISCLOSURES**